

Jennifer R. Thomas (SBN 199972)
VAN DE POEL, LEVY, THOMAS LLP
1600 South Main Plaza, Suite 325
Walnut Creek, California 94596
Telephone: (925) 934-6102
Facsimile: (925) 934-6060
Email: jthomas@vanlevylaw.com

5 Attorney for Defendant
SF MARKETS, LLC, erroneously sued as
6 SPROUTS FARMERS MARKET, LLC

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

MINOO GOLSHAN, an individual

Plaintiff,

VS.

SPROUTS FARMERS MARKET, LLC; and
DOES 1 - 50 inclusively,

Defendants.

CASE NO.: 2:24-cv-06709-MRA-AJR

**CONFIDENTIALITY STIPULATION AND
[REDACTED] PROTECTIVE ORDER**

The discovery sought by the parties in the above-styled case is likely to involve production of documents and things containing business, competitive, proprietary, patented, trade secret or other information of a sensitive nature about the parties (or of another person which information the party is under a duty to maintain in confidence), hereafter referred to as “Confidential Information,” and witness testimony containing Confidential Information. Accordingly, the Court hereby ORDERS as follows:

Designation of Confidential Information

1. *Designation of Material.* Documents and other things claimed to be or to contain Confidential Information shall, prior to production, be marked by the producing party as "Confidential." Placement of the "Confidential" designation on each protected page or on the initial

1 page of a protected document when it is produced shall constitute notice and shall designate the
2 document as Confidential material. Copies, extracts, summaries, notes, and other derivatives of
3 Confidential material also shall be deemed Confidential material and shall be subject to the
4 provisions of this Order.

5 2. *Subsequent Designation.* Documents and/or materials produced in the litigation that
6 are not identified as Confidential Information when they were initially produced may within a
7 reasonable time thereafter be designated as Confidential by the producing party, or by the party or
8 parties receiving the production, or by a person, by providing written notice to counsel for all other
9 parties and to any person who may be involved. Each party or person who receives such written
10 notice shall endeavor to retrieve any Confidential Information that may have been disseminated, shall
11 affix a “Confidential” designation to it, and shall thereafter distribute it only as allowed by this Order.
12 No distribution prior to the receipt of such written notice shall be deemed a violation of this Order.

13 3. *Designation of Depositions.* Depositions or portions thereof upon oral or written
14 questions may be classified as Confidential Information either by an examining party's attorney or by
15 an attorney defending or attending the deposition. A party claiming that a deposition or any portion
16 thereof is Confidential Information shall give notice of such claim to the other affected parties and
17 persons either prior to or during the deposition, or within twenty-eight (28) days after receipt of the
18 deposition transcript, and the testimony taken and the transcript of such deposition or portion thereof
19 shall be designated as Confidential.

20 4. *Modification of Designation.* The designation of Confidential Information by the
21 producing party shall not be determinative and may be modified or eliminated at any time in one of
22 two ways, as explained below.

- 23 (a) The producing party may agree in writing to downgrade or eliminate the Confidential
24 designation concerning any material it produced.
- 25 (b) If the parties cannot agree as to the designation of any particular information or
26 material after good faith discussion, the receiving party may move the court to
27 downgrade or eliminate the “Confidential” designation. The burden of proving that the
28 information has been properly designated as protected shall be on the party who made

1 the original designation.

2 5. *General Access.* Except as otherwise expressly provided herein or ordered by the
3 court, Confidential Information may be revealed only as follows:

- 4 (a) To outside counsel for a party hereto (and secretaries, paralegals, and other staff
5 employed in the offices of such outside counsel who are working on the litigation),
6 provided that outside counsel who are not of record must first sign and deliver to
7 counsel of record for each other party or parties a letter in the form of Exhibit A
8 hereto.
- 9 (b) To the parties after they have been given a copy of this Protective Order by their
10 outside counsel and signed a letter in the form of Exhibit A.
- 11 (c) To court reporters transcribing a deposition, hearing, or other proceeding in this matter
12 who sign Exhibit A attached hereto (excluding court-appointed court reporters).
- 13 (d) To independent experts and independent consultants (meaning a person who is not an
14 employee, officer, director, or owner in any capacity of a party and who is retained by
15 a party or a party's outside counsel in good faith for the purpose of assisting in this
16 litigation) who sign Exhibit A attached hereto.

17 Nothing herein shall prevent the producing party from showing the documents or information
18 to an employee of that party.

19 6. *No Copies/Notes.* Except for internal use by outside counsel for the parties hereto, for
20 court and deposition copies, and for such use as is expressly permitted under the terms hereof, no
21 person granted access to Confidential Information shall make copies, reproductions, transcripts, or
22 facsimiles of the same or any portion thereof or shall take notes or otherwise summarize the contents
23 of such Confidential Information.

24 7. *Disputes over Access.* If a dispute arises as to whether a particular person should be
25 granted access to Confidential Information, the party seeking disclosure may move the court to
26 permit the disclosure and must obtain an order of the court before disclosing the information.

27 Use of Confidential Information.

- 28 8. *Use in this Litigation Only.* Confidential Information may be used only for purposes of

1 this litigation. Each person to whom the disclosure of any Confidential Information is made shall not,
2 directly or indirectly, use, disclose, or disseminate, or attempt to use, disclose, or disseminate, any of
3 the same except as expressly provided herein.

4 9. *Use at Depositions.* If Confidential Information is to be discussed or disclosed during
5 a deposition, the producing party shall have the right to exclude from attendance at the deposition,
6 during the time the Confidential Information is to be discussed, any person not entitled under this
7 Order to receive the Confidential Information.

8 10. *Use at Court Hearings and Trial.* Subject to the Rules of Court, California Rules of
9 Evidence, Confidential Information may be offered into evidence at trial or at any hearing or oral
10 argument, provided that the proponent of the evidence containing Confidential Information gives
11 reasonable advance notice to the Court and counsel for the producing or designating party. Any party
12 may move the Court for an order that the evidence be received in camera or under other conditions to
13 prevent unnecessary disclosure.

14 11. *Future Filing Under Seal.* Any documents which are filed with the Court in the future,
15 including briefs, deposition transcripts, or portions thereof, which disclose Discovery Material which
16 has been designated as “CONFIDENTIAL”. Any such submission of confidential documents to the
17 Court shall be accompanied by a Motion to Seal Documents, a Motion for a Protective Order, or
18 other applicable application under the Rules of Court, to ensure that such documents are properly
19 filed under seal.

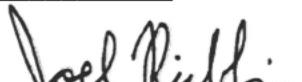
20 12. *Reasonable Precautions.* Counsel for each party shall take all reasonable precautions
21 to prevent unauthorized or inadvertent disclosure of any Confidential Information.

22 Other Provisions

23 13. *Not an Admission.* Nothing in this Order shall constitute an admission by the party that
24 information designated as Confidential is actually Confidential Information. Furthermore, nothing
25 contained herein shall preclude the parties or a person from raising any available objection, or
26 seeking any available protection with respect to any Confidential Information, including but not
27 limited to the grounds of admissibility of evidence, materiality, trial preparation materials and
28 privilege.

1 14. *Miscellaneous.* This Order shall apply to the production of all materials whether or not
2 such materials are informally produced or produced in response to a formal discovery request or a
3 Court order in this litigation. This Order may be used to protect the confidentiality of the residential
4 addresses and social security numbers of the parties and of any and all current or former employees
5 of either of the parties or their affiliates.

6 IT IS SO ORDERED, this 26th day of December, 2024



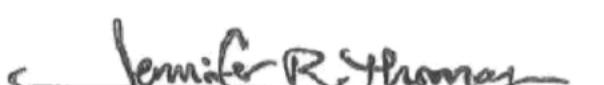
7 Honorable ~~Monica Ramirez Almadan~~

8 9 A. Joel Richlin

10 **SO STIPULATED AND AGREED:**

11 
12 Attorneys for Plaintiff
13 Minoo Golshan

14 **SO STIPULATED AND AGREED:**

15 
16 Attorneys for Defendant
17 SF Markets LLC

1 MINOO GOLSHAN, an individual,
2 Plaintiff,
3 vs.
4 SPROUTS FARMERS MARKET, LLC; and
5 DOES 1 - 50 inclusively,
6 Defendants.

7 **EXHIBIT A**

8 **AGREEMENT CONCERNING INFORMATION COVERED BY PROTECTIVE ORDER**

9
10 I have been designated by Minoo Golshan [PARTY NAME] as a person who may have access to
11 Confidential Information as that term is defined in the Protective Order (the "Order") entered in the
12 above-entitled case.

13 Having read the Order, I agree to comply fully with it and to be bound by its terms with
14 respect to all documents and information designated as "Confidential" under the Order. I agree not to
15 copy any documents or information that have been designated as "Confidential" and disclosed to me
16 and not to disclose such documents or information to any person or entity not authorized under the
17 Order to view Confidential Information.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct.

20 Executed this 20 day of 12, 2024

21 Minoo Golshan
22 Name

23 9440 Santa Monica Blvd. # 707
24 Address Beverly Hills, CA 90210

25 Sey
Employer

26 Attorney
Job Title